

DECLARATION OF LOUIS J. MEYER

Pursuant to 28 U.S.C. §1746, I, LOUIS J. MEYER, declare as follows:

1. I am an attorney licensed to practice in the State of Illinois since 2006. I have been a member of the trial bar of the United States District Court for the Northern District of Illinois since 2007. I have been practicing law for 16 years. I focus my practice primarily on constitutional litigation.

2. I graduated with honors from the University of Iowa in 2001 and from DePaul College of Law in 2006. At DePaul, I received an honor in trial advocacy and was on the Dean's Honor List.

3. After law school, I worked as an attorney at Jackowiak Law Office, where I was employed for approximately five years. At Jackowiak Law Office, I gained significant courtroom experience. I took hundreds of depositions, managed a large caseload of constitutional cases and was involved in 8 federal jury trials and three state court jury trials. In addition to my courtroom experience, my experience at Jackowiak Law Office included researching and writing appeals and the supervision of less experienced attorneys and law clerks.

4. In 2011, I left Jackowiak Law Office and thereafter opened my own civil rights practice, Meyer & Kiss, LLC. In addition to handling my own cases, I have consulted with multiple civil rights and criminal defense attorneys in order to assist them in the prosecution of their civil rights cases.

5. As of the date of this declaration, I have handled over 300 civil rights cases in federal and state courts. I have worked on both sides of these cases, representing both Plaintiffs and Defendants. To date, I have tried 22 jury trials and numerous bench trials.

6. My current hourly rate for legal services in civil rights cases in the Northern and Central Districts of Illinois is \$450/hour. This rate is commensurate with the rates charged by other civil rights attorneys with similar experience and skill in the relevant communities.

7. As part of my practice, I keep abreast of the attorneys' fee decisions in the Seventh Circuit and the hourly rates of my colleagues who practice in the area of civil rights. I have observed many civil rights attorneys at trial and during other litigation, and have partnered with many attorneys on a case-by-case basis, which has allowed me to become familiar with the work of multiple civil rights attorneys in the Chicago area and in the Central District of Illinois.

8. I have known Adele Nicholas since 2009. I am familiar with her work and have partnered with her on numerous occasions, including trying three civil rights cases with her. My firm, Meyer & Kiss, LLC has contracted with Ms. Nicholas to assist with the drafting of two Seventh Circuit briefs and to assist in litigation in numerous §1983 cases. I believe Ms. Nicholas to be among the most accomplished and competent civil rights attorneys in Chicago. Because of my collaboration with Ms. Nicholas and my personal knowledge of Ms. Nicholas's work, I would myself refer a case to her if I had a conflict or was unable to handle a case for some reason.

9. I am also familiar with the work of attorney Mark Weinberg and his long track record of successful advocacy for the constitutional rights of those whose rights are often overlooked, including panhandlers, street peddlers, and people with sex offense convictions. Ms. Nicholas and Mr. Weinberg have taken on many difficult constitutional cases, including the *Barnes v. Jeffreys* litigation, that other attorneys might shy away from.

10. I am aware that Ms. Nicholas seeks an hourly rate of \$400 an hour and that Mr. Weinberg seeks an hourly rate of \$450 an hour. Based on my familiarity with the rates customarily charged by civil rights attorneys in Chicago, I believe their rates to be reasonable and perhaps on the low end of the market rates for attorneys with their accomplished records in civil rights litigation.

11. The rates requested are particularly reasonable given the difficulty of the *Barnes* case, where the plaintiffs were parolees with limited resources litigating against the State of Illinois—an opponent with vastly superior resources from which to draw. Ms. Nicholas' and Mr. Weinberg's dedication to defending the rights of this population is worthy of fair compensation.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s Louis J. Meyer
MEYER & KISS, LLC
311 W. Stratford Drive
Peoria, Illinois 61614

Dated: November 20, 2022